

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA

v.

Case No. 21-mj-18

KELLY HARPER,

Defendant.

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COMPLAINT FOR VIOLATION OF  
TITLE 18, UNITED STATES CODE, SECTION 1958(a)

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BEFORE United States Magistrate Judge  
Stephen L. Crocker

United States District Court  
120 North Henry Street  
Madison, Wisconsin 53703

DOC NO  
REC'D/FILED  
2021 FEB -8 AM 10:11  
PETER J. CROCKER  
CLERK OF COURT

The undersigned complainant being duly sworn states:

From on or about October 19, 2020 through on or about December 10, 2020, in the  
Western District of Wisconsin and elsewhere, the defendant,

KELLY HARPER,

used a facility of interstate commerce, specifically the Internet, with intent that the  
murder of KNOWN VICTIM be committed in violation of the laws of Wisconsin as  
consideration for the receipt of, and as consideration for a promise and agreement to  
pay, things of pecuniary value, specifically bitcoin.

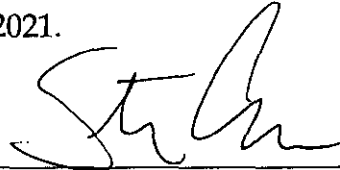
(In violation of Title 18, United States Code, Section 1958(a)).

This complaint is based on the attached affidavit of Bryan Baker



BRYAN BAKER  
Special Agent  
Federal Bureau of Investigation

Sworn to me this 5<sup>th</sup> day of February 2021.



HONORABLE STEPHEN L. CROCKER  
United States Magistrate Judge

COUNTY OF DANE )  
 ) ss  
STATE OF WISCONSIN )

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**AFFIDAVIT**

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I, Bryan Baker, having been first duly sworn on oath, state that:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since January of 2011. I am currently assigned to the FBI Milwaukee Division, Madison Resident Agency. My duties involve working criminal violations, including murder-for-hire investigations. I received training on the proper investigative techniques for this violation including surveillance techniques; interviewing methods of subjects, witnesses, and victims; and the preparation and execution of arrest, search, and seizure warrants.

2. The facts in this affidavit come from my training and experience, as well as my personal participation in this investigation via reports prepared by, and information obtained from, other federal, state, and local law enforcement agents and officers, all of whom I believe to be truthful and reliable. This affidavit does not contain every fact I know about this investigation, and is merely intended to show probable cause that KELLY HARPER committed a violation of Title 18, United States Code, Section 1958(a)(murder-for-hire).

**PROBABLE CAUSE**

3. On January 12, 2021, an officer from the Sun Prairie Police Department (SPPD) responded to a suspicious person call at a residence in Sun Prairie, Wisconsin. When the officer arrived, he observed an individual, later identified as a local journalist

(JOURNALIST #1), sitting at the kitchen table with KNOWN VICTIM (KV). Both KV and JOURNALIST #1 were participating in a videoconference call with two males identified as JOURNALIST #2 and JOURNALIST #3. The officer spoke to JOURNALIST #2 and JOURNALIST #3 who advised they were working on an investigative report. Specifically, JOURNALIST #2 told the officer that, while investigating a murder-for-hire site on the dark web, they uncovered information showing someone wanted to kill KV. KV then gave the officer a document he received from JOURNALIST #2. The document summarized the investigation and included chat communications that took place from December 3 through December 10, 2020 between an unknown subject (UNSUB) and an individual purporting to be a murder-for-hire site administrator on the dark web. All of the chats related to UNSUB soliciting the administrator to kill KV. For example, in a chat dated December 3, 2020, UNSUB sent the administrator KV's name and address and stated, "The target needs to be killed, he is a white 5 foot 5 male, dark brown short hair, blue eyes, weighs 165 pounds..." UNSUB included details about KV's vehicle, where KV worked, and KV's cell phone number. UNSUB also included pictures of KV and KV's vehicle. The murder-for-hire site administrator responded to UNSUB's message and requested proof of payment in the form of bitcoin. UNSUB responded by sharing a screenshot of a bitcoin wallet with a value of approximately \$5,633.87.

4. On January 13, 2021, KV's girlfriend filed a complaint with the FBI's National Threat Operations Center, and provided the FBI with information KV received from the journalists.

5. On January 14, 2021, I interviewed JOURNALIST #2 and JOURNALIST #3, as well as another journalist helping with the investigation. All three journalists verified the accuracy of the information provided by KV's girlfriend. The journalists explained that, while investigating a murder-for-hire dark web site located outside of Wisconsin, they identified UNSUB as a person who wanted to kill KV. Through an analysis of the chats between UNSUB and the murder-for-hire site administrator, the journalists identified an October 19, 2020 bitcoin transfer from UNSUB to the administrator of a second murder-for-hire dark web site. The journalists included their bitcoin analysis in the document they provided to KV.

6. An analyst from the FBI's Money Laundering, Forfeiture, and Bank Fraud Unit reviewed the bitcoin transfer provided by the journalists and identified an IP address, email account, and telephone number associated with UNSUB's bitcoin wallet. Through the use of grand jury subpoenas, I determined that the IP address, email account, and telephone number were associated with KELLY HARPER.

7. On February 5, 2021, agents from the FBI's Milwaukee Field Office executed a federal search warrant at HARPER's residence in Columbus, Columbia County, Wisconsin. During the search, agents found screenshots from a murder-for-hire dark web site, as well as one of the pictures UNSUB sent to the murder-for-hire site administrator.

8. As FBI agents executed the search warrant at HARPER's residence, I interviewed HARPER at the SPPD. During this interview, HARPER admitted to paying

bitcoin to the administrator of a murder-for-hire dark web site in order to have KV killed.

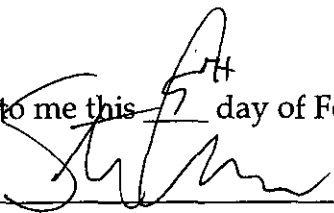
CONCLUSION

9. Based on the foregoing facts, I believe there is probable cause that KELLY HARPER committed a violation of Title 18, United States Code, Section 1958(a)(murder-for-hire).



Bryan Baker  
Special Agent, Federal Bureau of  
Investigation

Sworn to me this <sup>Art</sup> 7 day of February 2021.

  
Honorable Stephen L. Crocker  
United States Magistrate Judge